

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1**

**SCARINCI HOLLENBECK, LLC  
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*Counsel for Nest Global Solutions, LLC*

In Re:

NEST GLOBAL SOLUTIONS, LLC

Debtor.

Chapter 11

Case No.: 23-18405-JKS

**APPLICATION OF THE DEBTOR FOR ENTRY OF AN ORDER PURSUANT TO  
11 U.S.C. §§327(a), 328(a) AUTHORIZING THE DEBTOR TO RETAIN  
JONATHAN STONE, ESQUIRE AS SPECIAL COUNSEL**

TO: THE HONORABLE JOHN K SHERWOOD, U.S.B.J.:

Nest Global Solutions, LLC (the “Debtor”) respectfully submits this application (the “Application”) to this Court for entry of an order pursuant to sections 327(e) and 328(a) of Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court, District of New Jersey (the “Local Bankruptcy Rules”) authorizing and approving the employment and retention of Jonathan Stone, Esquire (the “Stone Firm”) as the Debtor’s Special Counsel. The facts and circumstances supporting this Application are set forth herein and in the Certification of Jonathan Stone (the “Stone Cert”) submitted herewith. In further support of this Application, the Debtor respectfully states as follows:

### **BACKGROUND**

1. On September 26, 2023 (the Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.
2. Pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code, the Debtor remains in possession of its assets as a debtor-in-possession.
3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§157 and 1334 and the Standing Order of Reference of the Bankruptcy Court Under Title 11 by the United States District Court for the District of New Jersey, as amended on September 18, 2012 (Simandle, C.J.).
4. Venue of the Debtor’s chapter 11 case is proper in this district pursuant to 28 U.S.C. §§1408 and 1409. This is a core proceeding under 28 U.S.C. §157(b)(2). The statutory predicates for the relief requested herein are sections 327 and 328 of the Bankruptcy Code, Bankruptcy Rule 2014(a) and Local Bankruptcy Rule 2014-1.

### **RELIEF REQUESTED**

5. By this Application the Debtor seeks entry of an order pursuant to sections 327(e) and 328(a) of the Bankruptcy Code and Bankruptcy Rule 2014(a) authorizing the Debtor to employ and retain the Stone Firm as the Debtor’s Special Counsel for purposes of preparing tax returns and tax resolution services on the Debtor’s behalf<sup>1</sup>.
6. The Stone Firm has extensive experience and resources with respect to providing such tax preparation and tax resolution services and is familiar with the Debtor’s books and records. The Stone Firm proposes to bill the Debtor at the hourly rate of \$400 in order to prepare the 2023 tax returns and assist the Debtor with a 2021 Form 1065.

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<sup>1</sup> Mr. Stone is an attorney and a certified public accountant. Mr. Stone requests that he be retained as counsel herein.

7. It should be noted that the Internal Revenue Service filed a large proof of claim in the amount of nearly \$300,000.00. It is anticipated that the Stone Firm will investigate and assist in seeking to reduce or eliminate same.

8. Debtor does not owe any money to the Stone Firm.

9. Except as set forth in the Stone Cert. and above, to the best of the Debtor's knowledge, (i) The Stone Firm is not a creditor of the Debtor and no member of the firm is an equity security holder or insider of the Debtor; (ii) no member of the Stone Firm is or was, within two years of the Petition Date, a director, officer or employee of the Debtor, and (iii) the Stone Firm does not represent any interest materially adverse to the interests of the estate or any class of creditors, or equity security holders.

10. The Debtor believes that the employment of the Stone Firm is necessary and in the best interest of its estate, and that the Stone Firm is a "disinterested person" within the meaning of sections 101(14) and 327(a) of the Bankruptcy Code.

11. No previous Application for the relief sought herein has been made to this or any other Court.

### **NOTICE**

12. In accordance with Local Bankruptcy Rule 2014-1(a), notice of this Application has been given to: (i) the Debtor; (ii) the Office of the United States Trustee; (iii) the Debtor's secured creditors; and (iv) all parties that have filed a notice of appearance herein. In light of the nature of the relief requested herein, the Debtor submits that no further notice is required.

WHEREFORE, the Debtor respectfully requests entry of an order substantially in the form submitted herewith (i) granting the Application and authorizing the Debtor to employ and

retain the Stone Firm for tax preparation and tax resolution services on the terms set forth herein,  
and (ii) granting such other and further relief as is just and proper.

**SCARINCI HOLLENBECK, LLC**  
Attorneys for Nest Global Solutions, LLC

Dated: December 15, 2023

By: /s/ David Edelberg  
David Edelberg